



ecology and environment, inc.

160 SPEAR STREET, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415/777-2811

International Specialists in the Environment

SFUND RECORDS CTR
2079492

MEMORANDUM

TO: Paul La Courreye, EPA
FROM: Patty Cook, E & E, Inc.
DATE: September 16, 1988
SUBJECT: Completed Work
cc: Marcia Brooks, E & E, Inc.

This list is for the attached completed:

☐ PA(s)
☐ PA Review(s)
☒ PA Reassessment(s)
☐ SI(s)
☐ Other _____

*PA-2 Complete
Paul 12-5-88*

<u>Site Name</u>	<u>EPA I.D.#</u>	<u>City</u>	<u>FIT Recom- mendation</u>	<u>State Lead</u>
Union Manufacturing, Inc,	AZD088301213	Chandler	NFRAP	

- CVT → A, PA2, N, F, 12/12/88 F

ss/sw/para/umi

recycled paper



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International Specialists in the Environment

MEMORANDUM

TO: Paul La Courreye, EPA Region 9 Site Screening Coordinator

FROM: Su-san Wen, Ecology and Environment, Inc. *SW*

DATE: September 16, 1988

SUBJECT: Reassessment of Union Manufacturing, Inc.

EPA ID#: AZD088301213

THROUGH: Chris Lichens, Ecology and Environment, Inc. *CL*

COPY: FIT Master File
Patty Cook, Ecology and Environment, Inc.
Dan Marsin, Arizona Department of Environmental Quality,
Phoenix

INTRODUCTION

Under Technical Directive Document number F9-8709-019, Ecology and Environment, Inc.'s Field Investigation Team (FIT) has been tasked to reassess all Preliminary Assessments (PAs) in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) with "active" or "pending" status according to guidelines established to implement the Superfund Amendments and Reauthorization Act (SARA). The strategy for determination of further action under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) is based solely on each site's potential to achieve a score high enough on the Hazard Ranking System (HRS) for inclusion on the National Priorities List (NPL). This strategy is intended to identify those sites posing the highest relative risk to human health or the environment. All other sites needing remedial or enforcement follow-up will be referred to the States or an appropriate Federal agency.

This site was evaluated primarily using the original HRS model. Additionally, this site was also evaluated for its potential to score using the draft revised HRS model. The following is a summary of FIT's findings with regard to this site.

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SUMMARY

Union Manufacturing, Inc. (Union), currently inactive, is located in the Pima-Chandler Industrial Park on the Gila River Indian Reservation at 6625 West Allison Road in Phoenix, Arizona. In December 1980, Model Industries, Inc. purchased Union from Triangle Manufacturing of Stanford, Connecticut. Union began operating at the Pima-Chandler site in 1970. In the EPA RCRA database, Union is listed as a facility which has been certified cleaned and closed through 40 CFR 265 by the owner and a Professional Engineer.

Union was a tool box manufacturing facility. The boxes were made by cutting and pressing steel to the desired size and shape. The boxes were then cleaned, using a two-stage phosphatizing washer. The rinsate from the wash operation was piped into an on-site concrete-lined precipitating tank until January 1981. After this time, the "biodegradable" rinsate was discharged into the sewer, according to a facility representative. The use of the surface impoundment ceased in January 1981. According to a RCRA inspection report, dated December 29, 1982, solid waste from the tank was removed and placed in drums when the tank was deactivated. The tank was then filled with dirt. According to the Hazardous Waste Permit Application filed by Union, dated November 19, 1980, approximately 1050 pounds per year of liquid was pumped into the tank.

After the washing and drying process, the tool boxes were painted in the paint room. Toulene and xylene were used to thin the uncut paint. This process generated approximately 50 tons of waste per year, according to Union's Hazardous Waste Permit Application. The waste, which consisted of paint residues, used paint filters, paint covered paper and rags, was contained in drums.

Tool boxes with defective paint jobs were immersed in a 330-gallon metal tank containing a formula called the Western-Epoxy-Stripper. This compound is a mixture of methylene chloride, phenolics, acid activators, and surfactants. After being immersed in the stripping tank, the boxes were dipped in a drum containing ethylene glycol and a caustic chemical. The solids from the stripping process settled on a screen located at the bottom of the tank. A maximum of 6 drums of paint stripping sludge was generated every year from this activity. According to Union's manifest no. 001, 36 drums of flammable paint sludge was picked up by Southwest Solvents on December 1, 1982 for transport to BKK, California. These 36 drums of waste had accumulated on-site since October 1980.

Although the paint sludge from the paint stripping operation was contained, the wash water was not. Union was discharging the paint stripping wash water directly onto the ground. Quantities were estimated to average less than 1 gallon per day (operation being intermittent), according to the RCRA inspection report. A facility representative stated that land disposal of the wash water ceased in April 1981. The RCRA inspection report also indicated that paints used at Union did not contain lead or other toxic substances. In accordance with Union's EPA approved closure plan, soil contaminated by wash water from the paint stripping operation was removed in November 1983. Details of these soil sampling investigations are not available.

According to the Notification of Hazardous Waste Activities form filed by Union, dated August 1980, paint residue or sludges, wastewater from painting operations, xylene, acetone, ethyl acetate, toluene, methyl isobutyl ketone, and ethyl benzene were the wastes generated by operations on-site.

Groundwater in the Chandler area is used for drinking, and the depth to the aquifer of concern varies from 112-143 feet. There are 20 municipal wells serving the city of Chandler. The nearest well to the Union site is approximately 5000 feet away. It is estimated by the Water Division Superintendent of the City of Chandler that wells within a 3-mile radius of the site serve less than 3000 people (see contact report). The toxicity/persistence ratings for the wastes indicated in the Notification of Hazardous Waste Activities form range from fairly low to fairly high, with methyl isobutyl ketone rating the highest.

Since there are no surface waters within a 2-mile radius of the Union site, the target population appears to be zero.

The potential for an air release appears to be unlikely, since the tank has been filled with dirt, dumping to the ground has ceased, and contaminated soil has been removed from the site.

RECOMMENDATION

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1) EPA

FIT recommends no further action under CERCLA for the Union site. It does not appear to eligible for inclusion on the NPL due to the following factors:

- o depth to aquifer varies from 112-143 feet;
- o groundwater target population is fairly low;
- o no apparent surface water target population; and
- o low potential for an air release, since the tank has been filled, and contaminated soil has been removed.

2) State or Other Agency

A copy of this reassessment will be sent to the State for its consideration.

EPA CONCURRENCE

Initial

Date

No Further Action Under CERCLA

gml

12.5.88

High-Priority SSI

Medium-Priority SSI

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